

NOV 15 2010

John A. Clarke, Executive Officer/Clerk  
BY Shaunya Wesley, Deputy

90047  
A 722W

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Attorneys for Plaintiffs,  
Alvin Hooks, Alnisha Hooks a minor by and through her parent  
Alvin Hooks, Alvin Hooks in his capacity as Successor in  
Interest; Catherine Green, and James Wilkinson.

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES- CENTRAL DISTRICT

BC 449489

D7 Richard Acs

Alvin Hooks, an individual; )  
Alnisha Hooks a minor by and )  
through her parent Alvin )  
Hooks; Alvin Hooks in his )  
capacity as Successor in )  
Interest; Catherine Green, an )  
individual; and James )  
Wilkinson, an individual, )  
Plaintiffs. )

CASE NO.

Hon.  
Dept.

Ram  
~~FIRST AMENDED~~ COMPLAINT FOR  
DAMAGES FOR:

vs.

City of Los Angeles, a )  
California governmental )  
entity, Los Angeles City Fire )  
Department, form unknown; and )  
DOES 1 through 10, inclusive, )  
Defendants. )

1. WRONGFUL DEATH;
2. SURVIVAL;
3. NEGLIGENT INFLECTION OF  
EMOTIONAL DISTRESS; AND
4. LOSS OF CONSORTIUM

DEMAND FOR JURY TRIAL

INTRODUCTION

This lawsuit seeks to recover damages for Defendant's  
acts of negligently failing to examine and perform emergency  
medical diagnostic procedures, assessments, treatment; and

CIT/CASE: BC449489 LEA/DEFA:  
RECEIPT #: CCH465980050  
DATE PAID: 11/15/10 01:05:07 PM  
PAYMENT: \$395.00  
RECEIVED: 0310  
CHECK: 395.00  
CASH:  
CHANGE:  
CARD:

1 failure to provide scant care to Stephanie Hooks upon arriving at  
2 her home pursuant to a 911 distress call.

3 Plaintiffs alleges on information and belief as follows:

4 **PARTIES**

5 1. Plaintiff, Alvin Hooks, is, and at all times mentioned  
6 in this complaint was, a resident of Los Angeles County, State of  
7 California.

8 2. Plaintiff, Alnisha Hooks, a minor, by and through her  
9 parent Alvin Hooks is and all times mentioned herein in this  
10 complaint was, a resident of Los Angeles County, State of  
11 California.

12 3. Plaintiff, Catherine Green, is and all times mentioned  
13 herein in this complaint was, a resident of Los Angeles County,  
14 State of California.

15 4. Plaintiff, James Wilkinson, is and all times mentioned  
16 herein in this complaint was, a resident of Los Angeles County,  
17 State of California.

18 5. Plaintiff, Alvin Hooks in his capacity as Successor in  
19 Interest, is and all times mentioned herein in this complaint  
20 was, subject to the jurisdiction of Los Angeles County, State of  
21 California.

22 6. Plaintiffs are informed and believe, and on that basis  
23 allege, that defendant CITY OF LOS ANGELES, ("City"), is, and at  
24 all times mentioned herein was and is, a municipal governmental  
25 entity validly organized and conducting and doing business in the  
26 State of California and managing its municipal and governmental  
27 affairs, including providing paramedical services within the  
28

1 geographical borders of the City of Los Angeles, State of  
2 California.

3 7. Plaintiffs are informed and believe, and on that basis  
4 allege, that defendant LOS ANGELES FIRED DEPARTMENT("LAFD"), is,  
5 and at all times mentioned herein was and is, a municipal sub  
6 division of City that provided paramedical services within the  
7 geographical borders of the City of Los Angeles, State of  
8 California.

9 8. Plaintiffs are informed and believe, and on that basis  
10 allege, that DOES 1 through 10, (collectively referred to as "Doe  
11 Employees") are and were at all times mentioned in this  
12 complaint, employees of City or LAFD and were acting within the  
13 course and scope of their employment within the City of Los  
14 Angeles, State of California on the date the facts set forth  
15 herein occurred.

16 9. Plaintiffs are unaware of the true names and capacities  
17 of defendants sued herein as DOES 1 through 10, inclusive, and  
18 sue these defendants under such fictitious names. Plaintiff will  
19 seek leave of court to amend this complaint to name such  
20 defendants when their true names and capacities have been  
21 ascertained. Plaintiffs are informed and believe, and on that  
22 basis allege, that each of the fictitiously named defendants is  
23 in some manner responsible for the acts and omissions herein  
24 alleged.

25 10. Plaintiffs are informed and believe, and on that basis  
26 allege, that at all times herein mentioned, each of the  
27 defendants herein was the agent, servant, licensee, employee,  
28 assistant, consultant, or alter ego, of each of the remaining

1 defendants, and was at all times herein mentioned acting within  
2 the course and scope of said relationship. Plaintiffs are  
3 informed and believe that each and every defendant, when acting  
4 as a principal, was negligent in the selection and hiring of each  
5 and every other defendant as an agent, servant, employee,  
6 assistant, consultant or para professional member. Plaintiffs are  
7 further informed and believe, and thereon allege, that at all  
8 times herein mentioned, each business, governmental, municipal  
9 or corporate employer, through its officers, officials, directors  
10 and managing agents, and each individual defendant, had advance  
11 knowledge of the wrongful conduct of said agents, servants,  
12 licensees, employees, assistants, consultants and alter egos, and  
13 allowed said wrongful conduct to occur and continue to occur,  
14 thereby ratifying said wrongful conduct, and, after becoming  
15 aware of their wrongful conduct, each business, governmental,  
16 municipal, or corporate employer defendant, by and through its  
17 officers, officials, directors and managing agents, and each  
18 individual defendant, authorized and ratified the wrongful  
19 conduct herein alleged.

20 11. Before filing this complaint, on September 9, 2009,  
21 Plaintiffs filed governmental claim forms in the Office of the  
22 City Clerk for the City of Los Angeles, State of California. Said  
23 claims were deemed late. On March 26, 2010, Plaintiffs each filed  
24 an application for leave to file a late claim, which were  
25 accepted on April 7, 2010. More than 45 days from the date that  
26 Plaintiffs' late claims were accepted have elapsed.

27

28



1        15. Alnisha continued to talk to the 911 operator  
2 dispatcher for LAFD, communicating what she was observing. The  
3 911 operator asked was Stephanie turning colors? No Alnisha  
4 answered. The 911 operator asked if Stephanie was clammy?  
5 Alnisha responded no. However, right after those two questions,  
6 Stephanie belted out "somebody help me, I can't breath," to which  
7 the 911 operator commented that that was a good sign because he  
8 was able to hear her. As minutes kept going by and no arrival of  
9 LAFD, Alnisha placed the phone even closer to her mother so that  
10 she, Stephanie, could hear the LAFD dispatcher and be reassured  
11 that help was on the way. Meanwhile, Catherine was assisting  
12 Alvin in keeping Stephanie calm while Alvin went outside  
13 periodically to see if he could see or hear the LAFD paramedics  
14 coming.

15        16. On several occasions while the dispatcher was on  
16 speaker phone, Alnisha, Alvin and Catherine could hear the  
17 dispatcher communicating with LAFD and informing them that  
18 Stephanie was having difficulty breathing. After what seemed like  
19 an eternity, an LAFD paramedic truck with two paramedics arrived  
20 at their home.

21        17. When the paramedics got out of the truck, Alvin  
22 immediately told them that "my wife is in there on the living  
23 room floor, she's having difficulty breathing." Stephanie was  
24 still lying on the floor and struggling with breathing when one  
25 paramedic walked into the house. Although, Alvin told the  
26 paramedics that Stephanie was lying on the floor and having  
27 difficulty breathing, neither of the paramedics brought oxygen  
28

1 tanks or any other assisted breathing equipment, medicine or  
2 diagnostic equipment into the house.

3 18. Stephanie was lying inside the doorway about three feet  
4 from the entrance. One paramedic stepped inside the house and  
5 asked Alvin questions about Stephanie's medical history. However,  
6 the other paramedic just stood on the porch about two feet from  
7 the door entrance not responding to any of the visible signs  
8 indicating that Ms. Hooks was struggling to breath and was in  
9 respiratory distress. In fact, at one point in time Ms. Hooks  
10 gasped for air and said " I, can't breath." Still she was not  
11 given oxygen nor was her pulse, blood pressure or any other vital  
12 signs checked or taken. Moments later several more paramedics  
13 arrived on the scene. They too did not bring oxygen tanks or  
14 assisted breathing equipment onto the premises. As with the first  
15 two paramedics, the latter two did not attempt to take Ms. Hooks'  
16 pulse, blood pressure or check any of her vital signs.

17 19. Mr. Hooks, Alnisha, and Catherine repeatedly questioned  
18 the paramedics about helping Ms. Hooks, telling them that "she's  
19 having a problem breathing." Shortly thereafter Mrs. Hooks eyes  
20 became fixed as she gasped for her last breath while three LAFD  
21 paramedics watched. "Oh dear God," Catherine cried out. Her  
22 loving husband pleaded with the LAFD paramedics asking them "  
23 what's wrong with her, are you guys going to do anything?"

24 20. After Mrs. Hooks code blued in the presence of Mr.  
25 Hooks, Alnisah, and Catherine, one of the LAFD paramedics yelled  
26 out "four corners," after which, all four LAFD paramedics ran in  
27 and grabbed Mrs. Hooks and transported her to Centinela Hospital  
28 where she died two days later.

1 FIRST CAUSE OF ACTION

2 (Wrongful Death- Negligent Training Supervision; Failure to Use  
3 Skill, Knowledge and Care Against- City of Los Angeles, Los  
4 Angeles Fire Department; and DOES 1-10, inclusive)

5 21. Plaintiff reallege and incorporate by reference the  
6 allegations set forth in paragraphs 1 through 20 above, as though  
7 set forth at length herein.

8 22. As Set forth in paragraphs 1 through 21, inclusive,  
9 Defendants and each of them owed a duty of care to exercise  
10 reasonable care under the circumstances for Stephanie Hooks' care  
11 and protection. Defendants owed a duty of care to Stephanie to  
12 use the level of skill, knowledge and care in performing,  
13 assessing, diagnosing, and rendering emergency medical care and  
14 treatment to Stephanie Hooks that other reasonably careful and  
15 adequately trained paramedics, emergency medical technicians,  
16 nurses, physicians, surgeons, hospitals and health care  
17 professionals would use in the same or similar circumstances.

18 23. Defendants, and each of them named herein, breached  
19 their duty of care to Stephanie Hooks in that Defendants and each  
20 of them failed to provide Stephanie with life support measures,  
21 including but not limited to performing diagnostic assessment, or  
22 other vital sign assessments or examination procedures with the  
23 degree of skill and care that other reasonably careful and  
24 trained paramedics, emergency medical technicians, nurses,  
25 physicians, surgeons, hospitals and health care professionals  
26 would use in the same or similar circumstances.

27 24. Defendants, and each of them, named herein breached  
28 their duty of care to Stephanie Hooks in failing to provide



1 Stephanie Hooks with timely and appropriate life sustaining  
2 medical services, including but not limited to administration of  
3 oxygen, injection of blood thinner, and other medications as  
4 would have been authorized from the hospital base had Defendants  
5 timely and appropriately called for approval.

6 25. Defendants, and each of them, named herein failed to  
7 provide and or failed to use, appropriate medical equipment and  
8 emergency medical procedures so as to assess, diagnose or  
9 ascertain Stephanie Hooks medical condition with the degree of  
10 skill and care that other reasonably careful paramedics,  
11 emergency medical technicians, nurses, physicians, surgeons,  
12 hospitals and health care professionals would use in the same or  
13 similar circumstances.

14 26. As a direct and proximate result of Defendants' breach  
15 of their duty and negligence, Stephanie Hooks died on February  
16 23, 2009.

17 27. Prior to Stephanie Hooks' death, Plaintiffs were the  
18 husband, daughter, mother and son of decedent. Plaintiffs and  
19 each of them, prior to Stephanie Hooks death, relied and depended  
20 on Stephanie for support, maintenance, care, love, affection and  
21 counseling. At all times prior to her death, Stephanie was  
22 dutiful as a wife, mother and daughter to Plaintiffs named  
23 herein.

24 28. As a proximate result of the negligence of Defendants  
25 and each of them, and of the death of Stephanie Hooks, Plaintiffs  
26 have sustained pecuniary loss resulting from the loss of society,  
27 comfort, attention and services of Stephanie.  
28

1           29. As a further and proximate result of Defendants'  
2 negligence, and the death of Stephanie Hooks, Plaintiff Alvin  
3 Hooks has incurred funeral and burial expenses in an amount to be  
4 proven at trial.

5                           SECOND CAUSE OF ACTION

6 (Survival- Personal Injury in Failure to Use Skill, Knowledge and  
7 Care in Diagnosing and Treating Stephanie Hooks' Emergency  
8 Medical Condition- Against City of Los Angeles, Los Angeles Fire  
9 Department; and DOES 1 through 10, inclusive.)

10           30. Plaintiff reallege and incorporate by reference the  
11 allegations set forth in paragraphs 1 through 29 above, as though  
12 set forth at length herein.

13           31. Plaintiff Alvin Hooks is a successor in interest of  
14 Stephanie Hooks and succeeds to this cause of action because  
15 there is no personal representative of the estate of Stephanie  
16 Hooks. He brings this cause of action and complaint in the  
17 capacity of successor in interest. Plaintiff Alvin Hooks has  
18 executed and filed a declaration under the penalty of perjury as  
19 required by Code of Civil Procedure Section 377.32.

20           32. On or about February 21, 2009 Defendants an each of  
21 them failed and refused to use that proper degree of care of  
22 training, skill, and experience in treating, diagnosing and  
23 providing paramedic care to Stephanie Hooks in response to an  
24 emergency 911 request. Specifically, Defendants and each of the  
25 failed and refused to provide emergency medical care to Stephanie  
26 although she and her family members repeatedly informed, and made  
27 it known to LAFD's paramedics that she was having difficulty  
28

1 breathing, as she was displaying visible signs of respiratory  
2 distress.

3 33. On or about February 23, 2009, after the foregoing  
4 cause of action arose in her favor, Stephanie Hooks, would have  
5 been the Plaintiff in this lawsuit under this cause of action if  
6 she had lived.

7 34. Prior to her death and as a proximate result of  
8 Defendants' negligence, Stephanie Hooks, was required to and did  
9 employ physicians and surgeons to provide additional examination,  
10 treatment and care for her, and did incur medical and incidental  
11 expenses in the sum of at least \$15,000.00 or more.

12 35. In doing the acts herein alleged, Defendants and each  
13 of them acted with malice and oppression in purposefully refusing  
14 to provide scant care emergency medical care, treatment or  
15 diagnoses. Said conduct was vile and despicable in that  
16 Defendants and each of them knew Stephanie Hooks was in  
17 respiratory distress and could not breath, but stood around and  
18 did not nothing to diagnosis or treat her medical condition.

19 36. As paramedics, emergency medical technicians,  
20 physicians, nurses, surgeons, hospitals and health care  
21 professionals, Defendants owed Stephanie a duty of care to  
22 exercise reasonable care under the circumstances for Stephanie's  
23 care and protection. Defendants named herein owed a duty to  
24 Stephanie to use the level of skill, knowledge and care in  
25 performing an examination, diagnosis and treatment of Stephanie's  
26 emergency medical condition that other reasonably careful  
27 paramedics, emergency technicians, physicians, surgeons, nurses,  
28

1 hospitals and health care professionals would use in the same or  
2 similar circumstances.

3 37. As a direct and proximate result of Defendants' breach  
4 of duty and negligence, Stephanie, suffered the injuries,  
5 including but not limited to respiratory failure, shock, physical  
6 pain, mental suffering, emotional distress.

7 38. As a further direct and proximate result of Defendants'  
8 wrongful conduct Stephanie has been harmed in that she has  
9 incurred additional medical expenses, loss of earning capacity  
10 and additional amounts of money Stephanie would have received  
11 had she not been injured.

12 **THIRD CAUSE OF ACTION**

13 (Negligent Infliction of Emotional Distress- Against City of Los  
14 Angeles, Los Angeles Fire Department, and DOES 1 through 10,  
15 inclusive)

16 39. Plaintiffs reallege and incorporate by reference the  
17 allegations set forth in paragraphs 1 through 38 above, as though  
18 set forth at length herein.

19 40. Defendants named herein owed Plaintiffs a legal duty to  
20 not inflict emotional distress and mental suffering on  
21 Plaintiffs. Defendants and each of them breached by negligently  
22 causing injury to Stephanie in the presence of Plaintiffs.

23 41. At the time Defendants caused injury to Stephanie,  
24 Plaintiffs Alvin Hooks, Alnisha Hooks and Catherine Green and  
25 each of them witnessed Defendants' negligently inflicted injury  
26 on Stephanie. Plaintiffs and each of them were closely related  
27 to Stephanie Hooks as a husband, daughter and mother  
28 respectively. Plaintiffs were at the scene of the injury

1 producing event at the time it occurred and were aware that it  
2 was causing injury to Stephanie.

3 42. Plaintiffs, as a direct and proximate result of  
4 witnessing the injury producing event caused be Defendants, and  
5 each of them, have suffered sever emotional distress and mental  
6 suffering beyond that which would be anticipated in a  
7 disinterested witness.

8 **FOURTH CAUSE OF ACTION**

9 (Loss of Consortium- Against City of Los Angeles, Los Angeles  
10 Fire Department, and DOES 1 through 10, inclusive.)-

11 43. Plaintiff Alvin Hooks reallege and incorporate by  
12 reference the allegations set forth in paragraphs 1 through 42  
13 above, as though set forth at length herein.

14 44. At all times mentioned herein Plaintiff Alvin Hooks and  
15 Decedent Stephanie Hooks were, husband and wife.

16 45. Prior to the injuries sustained by Stephanie as set  
17 forth herein, Stephanie was able to and did perform her duties as  
18 a spouse. Subsequent to the injuries sustained by Stephanie, as  
19 set forth herein, and as a direct and proximate result thereof,  
20 Stephanie can no longer perform the work and services usually  
21 performed by her in the care, maintenance, and management of the  
22 family home. She can no longer engage in conjugal relationships  
23 with her Alvin or provide him with that special care of love,  
24 affection, solace, society, advice and counseling. She can no  
25 longer participate or assist in rearing of their minor child.  
26 Stephanie Hooks will no longer be able to perform such work,  
27 service, duties or in engage in conjugal fellowship in the  
28 future.

1        46. As a direct and proximate result of Defendants'  
2 negligence, Alvin Hooks has been permanently deprived and will be  
3 deprived of the consortium of Stephanie Hooks, including the  
4 performance of her necessary duties, all to Alvin Hooks' damage.  
5

6        WHEREFORE, Plaintiffs prays for relief as set forth  
7 hereafter:

8 AS TO THE FIRST CAUSE OF ACTION:

- 9            1. Damages according to proof;  
10            2. Funeral and Burial Expenses;  
11            3. Costs;  
12            4. Prejudgment interest; and  
13            5. Such other and further relief as the court deems just  
14 and proper.

15 AS TO THE SECOND CAUSE OF ACTION:

- 16            1. Damages according to proof;  
17            2. Costs;  
18            3. Punitive Damages;  
19            4. Prejudgment interest; and  
20            5. Such other and further relief as the court deems just  
21 and proper.

22 AS TO THE THIRD CAUSE OF ACTION:

- 23            1. Damages according to proof;  
24            2. Costs;  
25            3. Prejudgment interest; and  
26            4. Such other and further relief as the court deems just  
27 and proper.  
28

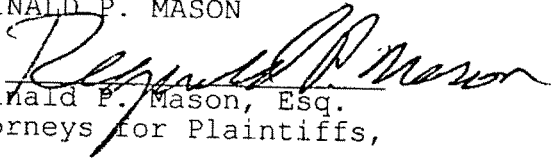
1 AS TO THE FOURTH CAUSE OF ACTION:

- 2 1. Damages according to proof;  
3 2. Costs;  
4 3. Prejudgment interest; and  
5 4. Such other and further relief as the court deems just  
6 and proper.

7  
8 PLAINTIFF HEREBY DEMANDS A JURY TRIAL IN THIS ACTION.

9  
10 DATED: November 5, 2010

11 MASON & MASON, LLP  
12 REGINALD P. MASON

13 BY:   
14 Reginald P. Mason, Esq.  
15 Attorneys for Plaintiffs,  
16  
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28

11/16/18

Exhibit "A"



BOARD OF FIRE COMMISSIONERS

GENETHIA HUDLEY-HAYES  
PRESIDENT

CASIMIRO U. TOLENTINO  
VICE PRESIDENT

DIANA M. BONTA  
ANDREW FRIEDMAN  
JILL FURILLO

BLANCA GOMEZ-REVELLES  
EXECUTIVE ASSISTANT II

CITY OF LOS ANGELES  
CALIFORNIA



ANTONIO R. VILLARAIGOSA  
MAYOR

DEPARTMENT OF FIRE

MILLAGE PEAKS  
FIRE CHIEF

200 NORTH MAIN STREET  
LOS ANGELES, CA 90012

(213) 978-3800  
FAX: (213) 978-3815

[www.lafd.org/comm.htm](http://www.lafd.org/comm.htm)

April 20, 2010

Alvin Hooks  
10211 S St. Andrews St  
Los Angeles, CA 90047

RE: CTS #2009000108

Dear Mr. Hooks:

A thorough investigation into your complaint regarding the incident on February 21, 2009 has been completed. The investigation has gone through several levels of review and the allegation(s) was Sustained, which means that the allegation(s) was proven. Therefore an appropriate departmental action will be imposed. However, our confidentiality policy precludes disclosure of the specific penalty.

Thank you for bringing this issue to our attention. The LAFD takes pride in providing the most professional and complete emergency service to citizens such as you. It is our goal to treat every customer in every circumstance with respect and courtesy. If you have any additional questions or concerns please contact the Professional Standards Division at (213) 473-7714.

Sincerely,

MILLAGE PEAKS  
Fire Chief

Ralph Terrazas, Commander  
Professional Standards Division

11/16/10

AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER

OFFICE OF THE  
ATTORNEY GENERAL  
STATE OF CALIFORNIA  
SACRAMENTO, CALIFORNIA

OFFICE OF THE ATTORNEY GENERAL



OFFICE OF THE ATTORNEY GENERAL  
SACRAMENTO, CALIFORNIA

OFFICE OF THE ATTORNEY GENERAL  
SACRAMENTO, CALIFORNIA

April 20, 2011

Attn: Honorable  
1000 Lakeside Blvd., Suite 200  
San Francisco, CA 94109

RE: CIVIL RIGHTS

Dear Sir:

A thorough investigation into your complaint regarding the incident on January 21, 2009 has been completed. The investigation has gone through several levels of review and the results of the investigation are as follows: (1) the allegations were not substantiated; (2) the incident was not a violation of the law; (3) the incident was not a violation of the policy; (4) the incident was not a violation of the code of conduct.

Thank you for bringing this issue to our attention. The LAFD is committed to providing the highest quality of service to the community and to ensuring that all incidents are handled in a fair and equitable manner. If you have any additional questions or concerns, please contact the Professional Standards Division at (916) 445-7344.

Sincerely,

WILLIAM DEAR  
The Chief

Professional Standards Division  
San Francisco, California

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Reginald P. Mason, SBN 243934 MASON & MASON, LLP 8200 WILSHIRE BLVD BEVERLY HILLS, CA 90211 TELEPHONE NO: 310-469-6692 FAX NO: 323-944-0413 ATTORNEY FOR (Name): Alvin Hooks et al		FOR COURT USE ONLY  <b>FILED</b> SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES  NOV 15 2010  John A. Chan, Executive Officer/Clerk BY <u>Shaunya Wesley</u> , Deputy	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: 111 N. Hill Street CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Central District			
CASE NAME: Alvin Hooks et v. City of Los Angeles et al			
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000)		<input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)	
<input type="checkbox"/> <b>Counter</b>		<input type="checkbox"/> <b>Joinder</b>	
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)		CASE NUMBER: <b>BC 449489</b>	
JUDGE:		DEPT:	

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input checked="" type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☒ punitive
4. Number of causes of action (specify): 4
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: November 12, 2010

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

#### NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

SHORT TITLE: Alvin Hooks et al v. City of Los Angeles et al	CASE NUMBER
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**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

**This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.**

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL <sup>10</sup> ☐ HOURS/ ☒ DAYS

Item II. Select the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

**Step 1:** After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column **A**, the Civil Case Cover Sheet case type you selected.

**Step 2:** Check one Superior Court type of action in Column **B** below which best describes the nature of this case.

**Step 3:** In Column **C**, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

**Applicable Reasons for Choosing Courthouse Location (see Column C below)**

- |   |  |
|---|--|
| 1. Class Actions must be filed in the County Courthouse, Central District.      | 6. Location of property or permanently garaged vehicle.    |
| 2. May be filed in Central (Other county, or no Bodily Injury/Property Damage). | 7. Location where petitioner resides.                      |
| 3. Location where cause of action arose.  | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred.                      | 9. Location where one or more of the parties reside.       |
| 5. Location where performance required or defendant resides.                    | 10. Location of Labor Commissioner Office.                 |

**Step 4:** Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	<b>A</b> Civil Case Cover Sheet Category No.	<b>B</b> Type of Action (Check only one)	<b>C</b> Applicable Reasons - See Step 3 Above
<b>Auto Tort</b>	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
<b>Other Personal Injury/Property Damage/Wrongful Death Tort</b>	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4. 1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 2., 4. 1., 2., 4.
		<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input checked="" type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1., 2., 3. 1., 2., 4.
<b>Non-Personal Injury/Property Damage/Wrongful Death Tort</b>	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.

Non-Personal Injury/Property Damage/  
Wrongful Death Tort (Cont'd.)

Employment

Contract

Real Property

Judicial Review Unlawful Detainer

SHORT TITLE: Alvin Hooks et al v. City of Los Angeles et al	CASE NUMBER
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A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons -See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1., 2., 3. 10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2., 5. 2., 5. 1., 2., 5. 1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5., 6. 2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels_____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
Unlawful Detainer- Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer- Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

SHORT TITLE: Alvin Hooks et al v. City of Los Angeles et al	CASE NUMBER
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Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance(21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 9. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.

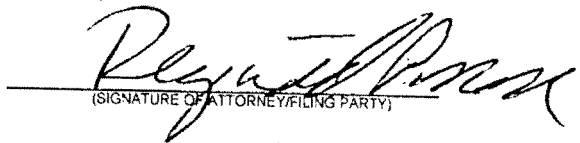
SHORT TITLE: Alvin Hooks et al v. City of Los Angeles et al	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE  <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input checked="" type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.		ADDRESS: 10211 South Saint Andrews Place
CITY: Los Angeles	STATE: CA	ZIP CODE: 90047

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the Stanley Mosk courthouse in the Central District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subs. (b), (c) and (d)).

Dated: November 12, 2010

  
(SIGNATURE OF ATTORNEY/FILING PARTY)

**PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:**

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev. 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.